

STATE OF VERMONT
ORLEANS COUNTY SS.



RICHARD QUIRION
PLAINTIFF

v.

MRNEAGASTER
NEWPORT CITY POLICE DEPT.
VERMONT PUBLIC SAFETY

RECEIVED

NOV 20 2009
109-CV-251
U.S. DISTRICT COURT
BURLINGTON, VT.

CIVIL ACTION
UNDER DT12 #5601
DOC #
JURY TRIAL
DEMANDED

288-10-08aw

COMPLAINT

NOW COMES the plaintiff Richard Quirion and by and through himself and hereby claims a violation of his 8th amendment for the following reasons.

1. I was arrested on March 9, 2007 by the Newport City Police Department by officer Lancaster

2. I was then taken to the Newport City Police Department where officer Lancaster ordered me to empty my pockets onto the table. In my pocket was my bottle of Nitro Glycerin for my heart as well as my Atrovent inhaler for my Asthma which are both prescribed to me by Physician DR. Robert Trembly who instructed me carry them both with me at all times.

3. I told officer Lancaster that I needed my medicines on me, he stated to me that I don't need them and placed them inside a locker in the police station.

4. Officer Lancaster intentionally put my life in jeopardy by not letting me have my medicines on me incase I had either a asthma attack or a heart attack while at the Police Station and while we were in route to the Northern State Correctional Facility.

5. When I got to the Prison I was not given my medicines until they found out I was going to be staying in the facility

for a while.

6. Party's : Richard Quirion is currently incarcerated at the Northern State Correctional Facility which is at 2559 Glen Road Newport Vermont, 05855, PH. # 1-802-334-8960.

7. The Defendant officer Lancaster of the Newport City Police Department and the Department of Public Safety is represented by Howard Kalfus 103 South Main Street Waterbury Vermont, 0561- 2101

8. Plaintiff hereby seeks punitive damages in the amount of \$100,000,00 for the actions of the Defendant and purposely and willingly taking and putting my life in harms way by taking away my life sustaining medicines and putting my life in danger.